

REMARKS

I. Claim Rejections Under 35 U.S.C. § 102(b) and §102(e)

In the Office Action, the Examiner has rejected Claims 1-6 and 13-16 under 35 U.S.C. § 102(e) as allegedly being anticipated by Gochnour et al., U.S. Patent 6,865,086. The Examiner has rejected Claims 1, 8, 9, 15, 17, and 18 under 35 U.S.C. § 102(b) as allegedly being anticipated by Ainsbury, U.S. Patent 5,513074. Applicants respectfully disagree.

Applicants have amended independent Claims 1. Applicants now claim:

A multi use circuit module comprising:

a front half module, the front half module being a functional circuit module having electrical contacts on a front portion thereof, the front half module having a channeling formed on the rear section thereof, the channeling running from a side wall of the front half module along a length of the front half module;

a rear half module removably coupled to the front half module, a tab member formed on a front portion of the rear half module;

at least one locking ball formed on a surface within the channeling; and

at least one indentation formed on the tab member, the at least one indentation being similar in size and shape to the at least one locking ball and mating with the at least one locking ball when the tab member is slid within the channeling to lock the front half module to the rear half module.

In contrast, Gochnour and Ainsbury both fail to disclose a locking ball formed on a surface within the channeling. Gochnour and Ainsbury further fail to disclose an indentation formed on the tab member, the indentation being similar in size and shape to the locking ball, the indentation mating with the

locking ball when the tab member is slid within the channeling to lock the front half module to the rear half module.

The Examiner contends on Page 8 of the Office Action that Gochnour teaches a locking ball (Fig. 4a, element 148) and an indentation 129. However, as seen more clearly in Figure 3 of Gochnour, element 148 is just a rounded edge of the biasing portion 146. Element 148 is not a locking ball formed on a surface within a channeling. Furthermore, element 129 is just the bottom floor of the front recess of the memory card. It is not an indentation being similar in size and shape to the locking ball.

Therefore, for the reasons stated above, Applicants believe that the rejections under 35 U.S.C. §102 (b) and §102(e) has been overcome. Such action is earnestly solicited.

II. Claim Rejections Under 35 U.S.C. § 103(a)

In the Office Action, the Examiner has rejected Claim 7 under 35 U.S.C. § 103(a) as allegedly being anticipated by Gochnour et al., U.S. Patent 6,865,086.. The Examiner has rejected Claims 10-12 under 35 U.S.C. § 103(a) as allegedly being anticipated by Ainsbury, U.S. Patent 5,513,074. Applicants respectfully disagree.

Claim 1 is now Claim 7 in independent form and is stated above. Gochnour fails to disclose or anticipate a locking ball formed on a surface within the channeling. Gochnour also fails to disclose or anticipate an indentation formed on the tab member, the indentation being similar in size and shape to the locking ball, the indentation mating with the locking ball when the tab member is slid within the channeling to lock the front

half module to the rear half module.

The locking 148 which the Examiner contends is disclosed in Gochnour is just a rounded edge of the biasing portion 146. Element 148 is not a locking ball formed on a surface within a channeling. Furthermore, element 129 is just the bottom floor of the front recess of the memory card. It is not an indentation being similar in size and shape to the locking ball as claimed by Applicants.

With regards to Claim 11, Applicants claim:

A multi use circuit module comprising:
a front half module, the front half module being a functional circuit module having electrical contacts on a front portion thereof;
a rear half module removably coupled to the front half module;
a channeling formed on a rear section of the front half module, the channeling running along a length of the front half;
a contact running along a length of the channeling for allowing electrical coupling between the front half module and the rear half module;
a tab member formed on a front portion of the rear half module; and
a mating connector pin formed on the tab member, the mating connector pin engaging the contact to electrically couple the front half module to the rear half module.

The Examiner contends that Ainsbury discloses the above. Applicants respectfully disagree. The Examiner contends that element 48 in Ainsbury is the same as the channel claimed by Applicant. However, element 48 is a side edge member as shown in Figure 4B and described in Column 5, lines 11-14. Element 48 is not a channeling formed on a rear section of the front half module, the channeling running along a length of the front half.

Even if element 48 is a channel, Ainsbury fails to disclose or anticipate an edge connector contact running along a length of the channeling for allowing electrical coupling between the front half module and the rear half module. The Examiner contends that Ainsbury discloses an electrical contact 42. However, the electrical connector 42 is placed on the circuit module 2 and does not run along a length of the channeling.

To further distinguish Claim 11 from Ainsbury, Applicants have added a new claim 23. Claim 23 read:

A multi use circuit module in accordance with Claim 11 wherein the front half module comprises a substrate having at least one die coupled thereto, the contact running along a length of the channeling formed in the substrate.

Ainsbury fails to disclose a channeling formed in a substrate of the front half module. As shown clearly in Figure 48, no channeling is formed in the substrate. Furthermore, the connector 42 is placed on top of the module and is not running along a length of the channeling formed in the substrate.

With regards to Claim 12, Applicants claim:

A multi use circuit module comprising:
a front half module, the front half module being a functional circuit module having electrical contacts on a front portion thereof;
a rear half module removably coupled to the front half module;
a tab member formed on a rear portion of the front half module;
a mating connector pin formed on the tab member;
a channeling formed on a front section of the rear half module, the channeling running along a length of the front half; and
a contact running along a length of the channeling, the mating connector pin engaging the edge connector contact to electrically couple the front

half module to the rear half module.

The Examiner contends that Ainsbury discloses the above. Applicants respectfully disagree. Ainsbury fails to disclose or anticipate a channeling formed on a front section of the rear half module, the channeling running along a length of the front half; and an edge connector contact running along a length of the channeling for allowing electrical coupling between the front half module and the rear half module. The Examiner contends that a channel is shown in Figure 2A in between elements 47. However, as shown more clearly in the exploded view in Figure 7, there is a void space between elements 47. Even if a channel is shown between elements 47, Ainsbury doesn't disclose an edge connector contact running along a length of the channeling for allowing electrical coupling between the front half module and the rear half module.

Therefore, for the reasons stated above, Applicants believe that the rejections under 35 U.S.C. §103(a) has been overcome. Such action is earnestly solicited.

III. Conclusion

Applicants respectfully submit that Applicants' claimed invention is deserving of patent protection because it describes a useful and functioning apparatus which is patentably distinguishable over the prior art.

In conclusion, Applicants respectfully submit that this Amendment Letter, in view of the Remarks offered in conjunction therewith, are fully responsive to all aspects of the objections and rejections tendered by the Examiner in the Office Action.

Applicants respectfully submit that they have persuasively demonstrated that the above-identified Patent Application, including Claims 1-2, 11-12 and 19-33 are in condition for allowance. Such action is earnestly solicited.

If the foregoing does not place the case in condition for immediate allowance, the Examiner is respectfully requested to contact the undersigned for purposes of a telephone interview.

If there are any fees incurred by this Amendment Letter, please deduct them from our Deposit Account NO. 23-0830.

Respectfully submitted,



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